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5  
6 United States District Court  
7 Northern District of California  
8 San Francisco Division

9 UNITED STATES OF AMERICA,

10 *Plaintiff,*

11 vs.

12 TODD WILLIAM GROWNEY,

13 *Defendant.*

No. 11-cr-00195-CRB-1

STIPULATION AND [~~PROPOSED~~] ORDER  
CONTINUING STATUS CONFERENCE

Date: April 11, 2012

Time: 2:15 p.m.

Judge: Hon. Charles R. Breyer

14  
15 **STIPULATION FOR CONTINUANCE OF STATUS CONFERENCE**

16 It is hereby stipulated and agreed to between the United States of America through OWEN  
17 MARTIKAN, Assistant United States Attorney, and defendant, TODD WILLIAM GROWNEY, by  
18 and through his respective counsel, that the status conference in the above-captioned matter set for  
19 Wednesday, April 11, 2012 at 2:15 p.m. be vacated and continued to Wednesday, May 2, 2012,  
20 at 2:15 p.m.

21 The parties further stipulate that the time period from Wednesday, April 11, 2012, up to and  
22 including the new status conference date of Wednesday, May 2, 2012, should be excluded from  
23 computation of the time for commencement of trial under the Speedy Trial Act. The parties  
24 stipulate that the ends of justice are served by the Court excluding such time, so that defense counsel  
25 may have reasonable time necessary for effective preparation, taking into account the exercise of due  
26 diligence. 18 U.S.C. § 3161 (h) (7) (B) (iv).

27 Specifically, a newly retained defense expert needs time to review the discovery provided by

1 the United States Attorney's Office, as well as an opportunity to view the evidence at the I.C.E.  
2 laboratory and/or discuss computer forensics with Agent Sacramento in order to fully analyze the  
3 forensic discovery for all possible defense issues not analyzed by defense counsel's previous forensic  
4 expert. This expert analysis is crucial in this case because of the format, creation and location of the  
5 alleged evidence. We anticipate that our defense expert can complete his analysis by May 1, 2012.

6 For these reasons, the defendant, defense counsel, and the government stipulate and agree  
7 that the interests of justice served by granting this continuance outweigh the best interests of the  
8 public and the defendant in a speedy trial. 18 U.S.C. § 3161 (h) (7) (B) (iv); 18 U.S.C. § 3161 (h)  
9 (7) (B) (ii).

10  
11 Respectfully Submitted,

12  
13 DATE: April 9, 2012

14 By: /s/ RJB  
ROBERT J. BELES  
Counsel for William Todd Growney

15 DATE: April 9, 2012

16 /s/ OM  
OWEN MARTIKAN  
Assistant U.S. Attorney

17  
18 IT IS SO ORDERED.

19  
20 Dated: April 10, 2012

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22   
23 HONORABLE CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE